

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) Crim. No. 19-cr-10195-WGY  
 )  
 HAOYANG YU, )  
 )  
 Defendant. )

**GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE FILING DEADLINES**

Counsel for the United States, with the assent of the defendant, moves to continue upcoming filing deadlines concerning the issue of “loss” and the defense’s motion to dismiss due to alleged selective enforcement.

First, regarding the issue of loss, the defense is scheduled to file briefs on both “loss” and selective enforcement by January 20, 2023. The government’s response deadline is February 3, 2023, and a hearing is scheduled for February 16, 2023. The parties jointly request that their filing deadlines on “loss” be extended by one week, such that the defense’s brief is due on January 27, 2023, and the government’s brief is due on February 10, 2023. This extension is necessary to enable the parties to appropriately address the issue in their respective briefs. The parties do not believe this scheduling adjustment requires any changes to the February 16<sup>th</sup> hearing and will be prepared to discuss the issue with the Court on that day.

Regarding the issue of selective enforcement, the government (with the defendant’s assent) recently moved to continue the parties’ respective filing deadlines so that it could complete its production of potentially relevant law enforcement materials. *See* ECF No. 338. The government continues to work diligently to complete its production and hopes to do so by early or

mid-February. Accordingly, the parties propose cancelling the current selective enforcement briefing schedule and discussing a new schedule with the Court during the February 16<sup>th</sup> hearing.

Counsel for the defense assents to the scheduling modifications proposed in this motion.

Respectfully submitted,

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